## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

DISABLED PATRIOTS OF AMERICA, INC.,	)
a Florida not for profit corporation, and	)
BONNIE KRAMER, individually,	)
Plaintiffs,	) Court No. 07 C 6351
vs.	) <u>Court 1(0, 07 C 0331</u>
GENERAL GROWTH PROPERTIES, INC., a Delaware corporation,	Judge Conlon Magistrate Judge Ashman
Defendant.	) )

## STIPULATED MOTION OF DEFENDANT FOR EXTENSION OF TIME WITHIN WHICH TO SERVE ITS RESPONSE TO PLAINTIFFS' COMPLAINT

Defendant, General Growth Properties, Inc. ("Defendant"), moves for an additional thirty (30) day extension of time until on, or before Wednesday, January 23, 2008, within which to serve its response to Plaintiffs' Complaint. The grounds for this Stipulated Motion are:

- 1. The Complaint in the above-styled action, which purports to assert claims for alleged violations of 42 U.S.C. § 12181, et seq., was filed by Plaintiffs on November 8, 2007 and was served upon Defendant on December 3, 2007. Defendant's response to the Complaint, therefore, is due by December 24, 2007.
- 2. Counsel for Defendant (who have only been recently retained), however, require the requested extension in order to have sufficient time to investigate the allegations set forth in the Complaint and to confer with their client in order to be able to prepare an appropriate response thereto.

3. Counsel for Defendant have contacted counsel for Plaintiffs, Thomas B. Bacon, Esq., and Mr. Bacon stipulates and consents to this extension as requested.

4. The Court has authority to grant extensions under Rule 6(b) of the Federal Rules of Civil Procedure. This motion is not for an extended period of time and therefore, should not create any prejudice or problem. As a result, Defendant respectfully requests that the Court exercise its authority and grant the requested thirty (30) day extension.

WHEREFORE, for all the foregoing reasons, Defendant, General Growth Properties, Inc., respectfully requests that this motion be granted.

Respectfully submitted,

s/ José A. Isasi, II

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## **CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2007, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

s/ José A. Isasi, II José A. Isasi, II

## **SERVICE LIST**

Disabled Patriots of America, Inc. et al. v. General Growth Properties, Inc.
Case No. 07cv6351
Judge Conlon/Mag. Judge Ashman
United States District Court, Northern District of Illinois

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-and-

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